

May 27, 2005

Mr. William J. Gaffney
NAPA SANITATION DISTRICT
935 Hartle Court
Napa, CA 94559

Re: April 2005 Compliance Monitoring Results for the Jefferson Car Wash Site Groundwater Extraction and Treatment System, 3080 Jefferson Street, Napa, California, Industrial User Permit No. 495950.

Dear Mr. Gaffney:

This letter presents the results of April 2005 Compliance Monitoring for the Groundwater Extraction and Treatment System (System) at the Jefferson Car Wash site, 3080 Jefferson Street, Napa, California. Compliance monitoring and reporting have been conducted in accordance with the guidelines stipulated in the Industrial User Permit No. 495950. Presented herein are the results of the 13th compliance monitoring event after System start-up on March 29, 2004.

The compliance monitoring activities for this reporting period were performed by Decon Environmental Services, the operations and maintenance (O&M) contractor for the System, under the direction of Malcolm Pirnie on April 29, 2005. The monitoring activities included:

1. Sampling the System effluent.

2. Recording the total volume of raw water discharged from individual extraction wells (EW-2 and EW-3).

3. Recording the total volume of treated water discharged to sanitary sewer.

Per the Permit requirements, effluent samples were analyzed for total petroleum hydrocarbons as diesel (TPH-D) by United States Environmental Protection Agency (USEPA) Method 8015M, TPH as gasoline (TPH-G), benzene, toluene, ethylene, total xylenes (BTEX), and methyl-tertiary-butyl ether (MTBE) by USEPA Method 8260B, and total lead by USEPA Method 6010B.

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Table 1 presents the analytical results for the System effluent and the System flow parameters. The analytical laboratory report is attached.

The analytical laboratory reported the concentrations of constituents of concern to be non-detect in the System effluent except for total lead. The total lead concentration in the System effluent was 0.005 mg/L, which was below the 0.14 mg/L permitted reporting limit. The average daily discharge rate for this reporting period was estimated to be 4.92 gallons per minute (gpm), which was below the 8 gpm limit. A total of 127,549 gallons of treated water was discharged to the sanitary sewer during this reporting period.

Please contact Jason at (510) 732-6444 Ext. 17 or Todd Miller with Malcolm Pirnie at (510) 735-3014 to discuss any comments or questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

DECON ENVIRONMENTAL SERVICES

Jason Gulbransen Project Manager

1. Julbranner

Attachments: Table 1, Analytical Laboratory Report

c: George Altamura, Altamura Enterprises

Mr. William J. Gaffney
NAPA SANITATION DISTRICT

Joel Coffman, Napa County
Todd Miller, Malcolm Pirnie
File (4459-008)
P:\u00e4459\u00e408\u00e4GWTS Compliance Monitoring\u00eText\u00e4April 2005 Compliance Monitoring Letter Report.doc

TABLE 1

Compliance Monitoring Results, April 2005 Interim Groundwater Extraction and Treatment System Jefferson Car Wash Site

Industrial User Permit No: 495950

Parameter	Units	USEPA Method	Date Collected	System Effluent	Permitted Reporting Limit ¹
Volatile Organic Compounds					
Methyl Tertiary-Butyl Ether	μg/L ²	8260B	4/29/2005	< 1	1.0% LEL ³
Benzene	μg/L	8260B	4/29/2005	< 0.5	1.0% LEL
Toluene	μg/L	8260B	4/29/2005	< 0.5	1.0% LEL
Ethylbenzene	μg/L	8260B	4/29/2005	< 0.5	1.0% LEL
Xylenes, Total	μg/L	8260B	4/29/2005	< 0.5	1.0% LEL
TPH as Gasoline	μg/L	8260B	4/29/2005	< 25	4
TPH as Diesel	μg/L	8015M	4/29/2005	< 50	
Total Lead	mg/L ⁵	6010B	4/29/2005	0.005	0.14
Operational					
Total Volume Discharged to Sanitary Sewer ⁶	gallons		4/29/2005	127,549	
Daily Average System Flow Rate ⁷	gpm ⁸		4/29/2005	4.92	8

Notes:

- i.e., $\{$ Sum of Flow Totalizer Volume at EW-2 and EW-3 for this period $\}$ -
 - { Sum of Flow Totalizer Volume at EW-2 and EW-3 for the previous period }

¹ As stated in Industrial User Permit, No: 495950, issued for the System on 03/02/2004.

² Micrograms per liter.

³ Lower explosive limit.

⁴ No reporting limit stated or not applicable.

⁵ Milligrams per liter.

⁶ The sum of volumes extracted from individual wells, EW-2 and EW-3, for this period as recorded by the flow totalizer at the respective well-head.

⁷ Calculated as the *Total Volume Discharged to Sanitary Sewer* divided by the number of days the system was in operation during the reporting period (18 days for this period).

⁸ Gallons per minute.

3334 Victor Court • Santa Clara, CA 95054 • (408) 588-0200 • Fax (408) 588-0201

Jason Gulbransen

Certificate ID: 43365 - 5/13/2005 5:21:56 PM

Decon Environmental Services, Inc.

23490 Connecticut Street

Hayward, CA 94545

Order Number: 43365

Project Name: Jefferson Carwash

Project Number: 4470

Date Received: 4/29/2005 2:05:43 PM

P.O. Number: 4470

Certificate of Analysis - Final Report

On April 29, 2005, sample was received under chain of custody for analysis. Entech analyzes samples "as received" unless

Matrix

Test

Method

Comments

Liquid

8260Petroleum

EPA 8260B

ICP-Metals

EPA 6010B

TPH as Gasoline by GC/MS

GC-MS

TPH-Extractable

EPA 8015 MOD. (Extractable)

Entech Analytical Labs, Inc. is certified for environmental analyses by the State of California (#2346). If you have any questions regarding this report, please call us at 408-588-0200 ext. 225.

Sincerely,

Laurie Glantz-Murph Laboratory Director

3334 Victor Court, Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Decon Environmental Services, Inc. 23490 Connecticut Street

Hayward, CA 94545 Attn: Jason Gulbransen Project ID: 4470

Date Received: 4/29/2005

P.O. Number: 4470

Sample Collected by: Client

Certificate of Analysis - Data Report

EPA 6010B EPA 3005A									
Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Lead	0.0050		1	0.0050	mg/L	5/3/2005	WM050503	5/12/2005	WM050503
								Analyzed by: Equej	a
								Reviewed by: DQu	eja
EPA 8015 MOD. (Extractal	ble)								
EPA 3510C Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Diesel	ND	riag	1	50	μg/L	N/A	N/A	5/3/2005	DW050502
Trn as Diesei	ND		1	30	μg/L	14/11	1077		
Surrogate	Surrogate Recovery	7	Control	Limits (%)				Analyzed by: BDha	
o-Ternhenyl	84		22	- 133				Reviewed by: bdha	balia
o-Terphenyl	84		. 22	- 133				Reviewed by: bdha	balia
o-Terphenyl EPA 8260B	84		* 22	- 133				Reviewed by: bdha	balia
EPA 8260B EPA 5030B			*						
EPA 8260B	84 Result	Flag	22 DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
EPA 8260B EPA 5030B		Flag	*		Units μg/L	N/A	N/A	Analysis Date 5/2/2005	QC Batch WMS1050502
EPA 8260B EPA 5030B Parameter	Result	Flag	DF	Detection Limit		N/A N/A	N/A N/A	Analysis Date 5/2/2005 5/2/2005	QC Batch WMS1050502 WMS1050502
EPA 8260B EPA 5030B Parameter Benzene	Result ND	Flag	DF	Detection Limit	μg/L	N/A N/A N/A	N/A N/A N/A	Analysis Date 5/2/2005 5/2/2005 5/2/2005	QC Batch WMS1050502 WMS1050502 WMS1050502
EPA 8260B EPA 5030B Parameter Benzene Toluene	Result ND ND	Flag	DF	0.50 0.50	μg/L μg/L	N/A N/A	N/A N/A	Analysis Date 5/2/2005 5/2/2005	QC Batch WMS1050502 WMS1050502 WMS1050502 WMS1050502
EPA 8260B EPA 5030B Parameter Benzene Toluene Ethyl Benzene Xylenes, Total	Result ND ND ND	Flag	DF	0.50 0.50 0.50	μg/L μg/L μg/L	N/A N/A N/A	N/A N/A N/A	Analysis Date 5/2/2005 5/2/2005 5/2/2005	
EPA 8260B EPA 5030B Parameter Benzene Toluene Ethyl Benzene	Result ND ND ND ND ND		DF 1 1 1 1 1 1	0.50 0.50 0.50 0.50 0.50	μg/L μg/L μg/L μg/L	N/A N/A N/A N/A	N/A N/A N/A N/A	Analysis Date 5/2/2005 5/2/2005 5/2/2005 5/2/2005	QC Batch WMS1050502 WMS1050502 WMS1050502 WMS1050502
EPA 8260B EPA 5030B Parameter Benzene Toluene Ethyl Benzene Xylenes, Total Methyl-t-butyl Ether	Result ND ND ND ND ND ND ND		DF 1 1 1 1 1 Control	0.50 0.50 0.50 0.50 0.50 1.0	μg/L μg/L μg/L μg/L	N/A N/A N/A N/A	N/A N/A N/A N/A	Analysis Date 5/2/2005 5/2/2005 5/2/2005 5/2/2005 5/2/2005	QC Batch WMS1050502 WMS1050502 WMS1050502 WMS1050502
EPA 8260B EPA 5030B Parameter Benzene Toluene Ethyl Benzene Xylenes, Total Methyl-t-butyl Ether Surrogate	Result ND ND ND ND ND ND ND ND ND N		DF 1 1 1 1 1 Control	0.50 0.50 0.50 0.50 0.50 1.0 Limits (%)	μg/L μg/L μg/L μg/L	N/A N/A N/A N/A	N/A N/A N/A N/A	Analysis Date 5/2/2005 5/2/2005 5/2/2005 5/2/2005 5/2/2005 Analyzed by: XBia	QC Batch WMS1050502 WMS1050502 WMS1050502 WMS1050502

EPA	5030B	

Parameter	Result F	lag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Gasoline	ND		1	25	μg/L	N/A	N/A	5/2/2005	WMS1050502
Surrogate	Surrogate Recovery	Со	ntrol	Limits (%)			And the second s	Analyzed by: XBia	n
4-Bromofluorobenzene	103	,	75	- 125				Reviewed by: MTu	ı
Dibromofluoromethane	103		75	- 125					
Toluene-d8	105		75	- 125					

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Quality Control - Method Blank Liquid

QC Batch ID: DW050502

QC Batch ID Analysis Date: 5/4/2005

Method Blank Method: EPA 8015 MOD. (Extractable)

DF **PQLR** Units Result Parameter TPH as Diesel ND 50 μg/L

% Recovery Control Limits Surrogate for Blank 22 - 133 o-Terphenyl 86.0

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Quality Control - Laboratory Control Spike / Duplicate Results Liquid

QC Batch ID: DW050502

QC Batch ID Analysis Date: 5/4/2005

Method: EPA 8015	5 MOD. (Extractab	ole)			Conc. Units	: μg/	L	
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<20	1000	950	LCS	94.6			40 - 138
TPH as Motor Oil	<90	1000	770	LCS	76.6			40 - 138
LCSD								
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<20	1000	1000	LCSD	103	8.7	25.0	40 - 138
TPH as Motor Oil	<90	1000	760	LCSD	76.4	0.26	25.0	40 - 138

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Quality Control - Method Blank Liquid

QC Batch ID: WMS1050502

Validated by: MTu - 05/03/05

QC Batch ID Analysis Date: 5/2/2005

Method Blank	Meth	od: EPA 8260	В				
Parameter			Result	DF	PQLR	Units	
Benzene			ND	1	0.50	μg/L	
Ethyl Benzene			ND	1	0.50	μg/L	
Methyl-t-butyl Ether			ND	1	1.0	μg/L	
Toluene			ND	1	0.50	μg/L	
Xylenes, Total			ND	1	0.50	μg/L	
Surrogate for Blank	% Recovery	Control Limits					
4-Bromofluorobenzene	95.8	75 - 125					
Dibromofluoromethane	113	75 - 125					
Toluene-d8	108	75 - 125					

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Quality Control - Method Blank Liquid

QC Batch ID: WMS1050502

Validated by: MTu - 05/03/05

QC Batch ID Analysis Date: 5/2/2005

Method Blank	Meth	od: GC-	MS				
Parameter			R	esult	DF	PQLR	Units
TPH as Gasoline			1	ND	1	25	μg/L
Surrogate for Blank	% Recovery	Control 1	Limits				
4-Bromofluorobenzene	103	75 -	125				
Dibromofluoromethane	101	75 -	125				
Toluene-d8	106	75 -	125				

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Quality Control - Laboratory Control Spike / Duplicate Results Liquid

QC Batch ID: WMS1050502

Reviewed by: MTu - 05/03/05

QC Batch ID Analysis Date: 5/2/2005

Method: EPA 8260B					Conc. Units	: μg/I	L	
LCS Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene	< 0.2	20	21	LCS	104			80 - 120
Methyl-t-butyl Ether	< 0.3	20	22	LCS	112			80 - 120
Toluene	<0.2	20	20	LCS	98.5			80 - 120
LCSD			At.	****				
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene	< 0.2	20	20	LCSD	101	2.9	25.0	80 - 120
Methyl-t-butyl Ether	< 0.3	20	22	LCSD	111	0.45	25.0	80 - 120
Toluene	<0.2	20	19	LCSD	96.5	2.1	25.0	80 - 120
Method: GC-MS					Conc. Units	: μg/	L	
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<6	120	130	LCS	101			65 - 135
LCSD					and the state of t			
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<6	120	120	LCSD	92.5	8.4	25.0	65 - 135

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Quality Control - Matrix Spike / Duplicate Results Liquid

Reviewed by: MTu - 05/03/05

QC Batch ID: WMS1050502

Analysis Date: 5/2/2005

Method	d EPA 8260B									Conc. Uni	its: μg/L
Parameto	er		Sample Result	Spike Amount	Spike Result	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
MS	SampleNumber:	43346-006									
Benzene			ND	20	18.6	MS	5/2/2005	93.0			65 - 135
Methyl-t-	butyl Ether		ND	20	19.0	MS	5/2/2005	95.0			65 - 135
Toluene			ND	20	18.2	MS	5/2/2005	91.0			65 - 135
MSD	SampleNumber:	43346-006		man of a secret in the late that we will the							
Benzene			ND	20	19.3	MSD	5/2/2005	96.5	3.7	25	65 - 135
Methyl-t-	butyl Ether		ND	20	20.3	MSD	5/2/2005	102	6.6	25	65 - 135
Toluene			ND	20	19.4	MSD	5/2/2005	97.0	6.4	25	65 - 135

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Quality Control - Method Blank Liquid

QC/Prep Batch ID: WM050503

Validated by: DQueja - 05/03/05

QC/Prep Date: 5/3/2005 1:00:00 PM

Method Blank	Method: EPA 6010B			
Parameter	Result	DF	PQLR	Units
Lead	ND	1	0.0050	mg/L

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Quality Control - Laboratory Control Spike / Duplicate Results Liquid

QC/Prep Batch ID: WM050503

Reviewed by: DQueja - 05/03/05

QC/Prep Date: 5/3/2005 1:00:00 PM

Method: EPA 6010B LCS					Conc. Units	s: mg/	'L	
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
Lead	<0.001	0.50	0.49	LCS	98.2		0000	75 - 125
LCSD								A CONTRACTOR
Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	% Recovery	RPD	RPD Limits	Recovery Limits
Lead	< 0.001	0.50	0.51	LCSD	102	3.4	25.0	75 - 125

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